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Before The

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Implementation of Section 17
of the Cable Television
Consumer Protection and
Competition Act of 1992

Compatibility Between Cable
Systems and Consumer Electronics
Equipment

ET Docket 93-7

COMMENTS OF BOOTH AMERICAN COMPANY

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March 22, 1993

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Broadcasting • Cable Communications

March 19, 1993

Compatibility with consumer electronics has been an issue for some years now. One obvious solution is to implement the "multiport" technology already agreed to and standardized by the "EIA/ANSI 563 Decoder Interface Standard". This alone will not solve the expanding problems created in part by the over zealous claims of VCR and television manufacturers. The well known term "Cable Ready" has become somewhat a point of laughter and frustration to the customer and the cable industry. These so called cable ready devices have caused countless service and telephone calls for cable operators around the country. As a customer service industry, cable operators have solved these misinformation problems by explaining and teaching consumers how to use the new TV or VCR. I might add, this is a situation that is mostly ignored by the dealers of this equipment and by the manufacturers themselves. As a matter of contrast, I don't believe the telephone company will install your answering machine, but I know many cable companies will install, program and instruct the consumer on his latest purchase of a VCR.

Scrambled channels are only a portion of the problems that exist for "Cable Ready" equipment. The demands on tuners in the cable television world are vastly different than the broadcast world. The fact is, the converter was created to overcome the gross deficiencies in the TV tuner produced by the TV manufacturer. Adjacent channel energy is not a concern for the broadcast world - it is for cable. Expanded channel bandwidth is not a broadcast concern - it is for cable. Direct pick-up interference is not a concern in the broadcast world - it is in cable. What is interesting to note is that the consumer electronics industry has not pursued this issue with any eagerness. The very industry that liberally coined the phrase "Cable Ready" is now stating that cable should be "TV Ready". Failure to implement the multiport system years ago is now becoming an issue for our law makers to get involved with. Compatibility is an important issue for our customers, but all players must do their part to solve the problem. With the many problems facing this great nation, I was very impressed how quickly cable television legislation was conceived and implemented.

If compatibility is such a great concern, what of the compatibility between and within the consumer electronics industry itself. I have one question for you, does your TV remote operate all the functions of your VCR? Cable has nothing to do with this problem and I see nothing being attempted to solve it.

I do believe the use of the term "Cable Ready" has prompted this concern beyond its normal bounds. This, as with many issues in the new cable law, demonstrates a great lack of industry understanding. This is clearly shown by Senator Leahy and his past proposals. Motivation seems to be out of political concern and not public concern.

Signal security is of paramount importance to this industry. Lost revenues due to theft of service translate to higher costs for all subscribers. Cable TV is not unique to this situation. Addressability is the only viable alternative for this MSO. Traps of any sort are not secure, and alternatives such as interdiction are not practical due to cost, implementation and track record.

This industry has been a self-induced generator of technological advancements. All of these advancements have benefited the viewing public in terms of programming and services. I would love to say, "Let's get all those converters out of our subscriber's homes". But, the alternatives are not there at this time. It can be done as a cooperative venture between the three industries: cable TV operators, consumer equipment manufacturers, and decoder manufacturers.

There are many sides to this argument and many valid points to be made by the involved parties. Hopefully, this decision will be based on clear rationale and not the need to make a move in an election year. If we could look back for a moment at the advancements made by the cable television industry over the years, the obvious question is, "Would the industry be where it is today with the mandate of compatibility?". Services and programming such as ATV, HDTV, digital compression and digital radio will all demand an interface device. To stifle any technological advancement in the name of compatibility would be counter productive and an